

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Court No. 04-CV-12572-RWZ
)	
MARYANNE THOMAS-SAADE,)	
)	
Defendant.)	

UNITED STATES' MOTION FOR DEFAULT

Pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, the plaintiff, United States of America, moves this Court to enter a default against the defendant, Maryanne Thomas-Saade (hereinafter "Thomas-Saade"), for failing to plead to, or otherwise defend, the complaint for the above captioned action.

In support, the United States says:

1. According to our office records, Thomas-Saade is indebted to the United States for the principal amount of \$168,939.37; plus \$5,472.32 accrued interest at the rate of 4.625 percent; plus costs. The total balance as of March 29, 2005 is \$174,411.69.

2. The submitted affidavit of Nancy M. Rojas, Paralegal for the United States Attorney's Office Financial Litigation Unit, Boston, Massachusetts, establishes Thomas-Saade's failure to plead to the complaint.

WHEREFORE, the United States moves this Court to enter a default, pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, against Thomas-Saade for failing to plead to, or otherwise defend, the complaint in the above captioned action.

Respectfully submitted,

UNITED STATES OF AMERICA
By its attorneys

MICHAEL J. SULLIVAN
United States Attorney

By:

/s/ Christopher R. Donato
CHRISTOPHER R. DONATO
Assistant U.S. Attorney
1 Courthouse Way, Suite 9200
Boston, MA 02210
(617) 748-3288

Dated: March 31, 2005

CERTIFICATE OF SERVICE

Suffolk, s.s.

Boston, MA

I hereby certify that on this day, I served a copy of the foregoing by mailing to Maryanne Thomas-Saade located at 17 Central Square, West Bridgewater, MA 02379.

/s/ Christopher R. Donato
CHRISTOPHER R. DONATO
Assistant U.S. Attorney

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)

Plaintiff,)

v.)

MARYANNE THOMAS-SAADE,)

Defendant.)

Civil Action No. 04-CV-12572-RWZ

AFFIDAVIT SUPPORTING UNITED STATES' MOTION FOR DEFAULT

I, Nancy M. Rojas, state under oath that:

1. I am a Paralegal with the United States Attorney's Office Financial Litigation Unit located in Boston, Massachusetts.

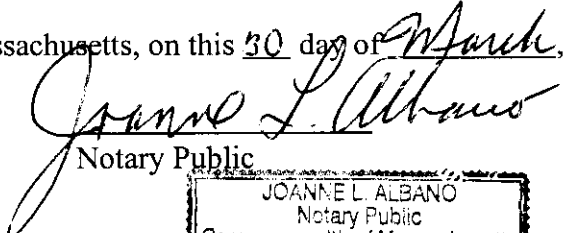
2. In that capacity, I process and maintain debt collection cases, including the case of Maryanne Thomas-Saade (hereinafter "Thomas-Saade"). I am also the custodian of the records for such cases.

3. Thomas-Saade was served, according to the return of service, with a summons and complaint on February 7, 2005 at 17 Central Square, West Bridgewater, MA 02379. See attached Exhibit "A". As of March 29, 2005, Thomas-Saade has not served on the United States Attorney an answer, or other responsive pleading, to the complaint in the above captioned action.

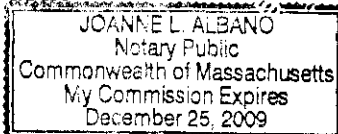

Nancy M. Rojas
Paralegal

Date: March 30, 2005

Signed and sworn to before me at Boston, Massachusetts, on this 30 day of March, 2005.


Notary Public

My commission expires:



U.S. Department of Justice
United States Marshals Service**PROCESS RECEIPT AND RETURN**

See Instructions for "Service of Process by the U.S. Marshal" on the reverse of this form.

PLAINTIFF	United States		COURT CASE NUMBER	04-cv-12572 RWZ
DEFENDANT	Margarita Thomas Soade		TYPE OF PROCESS	Summons & Complaint
SERVE ➔ AT	NAME OF INDIVIDUAL, COMPANY, CORPORATION, ETC., TO SERVE OR DESCRIPTION OF PROPERTY TO SEIZE OR CONDEMN			
	17 Central Square			
	ADDRESS (Street or RFD, Apartment No., City, State and ZIP Code)			
	West Bridgewater, MA 02379			
SEND NOTICE OF SERVICE COPY TO REQUESTER AT NAME AND ADDRESS BELOW:			2004 DEC 10 A 3:11 PM	
Nancy M. Rojas Financial Litigation Unit U.S. Attorney's Office One Courthouse Way Boston, MA 02210			Number of process to be served with this Form - 285	1
			Number of parties to be served in this case	1
			Check for service on U.S.A.	1

SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN EXPEDITING SERVICE (Include Business and Alternate Addresses, All Telephone Numbers, and Estimated Times Available For Service):

Fold

Please make service prior to March 7, 2005

Signature of Attorney or other Originator requesting service on behalf of:	<input checked="" type="checkbox"/> PLAINTIFF <input type="checkbox"/> DEFENDANT	TELEPHONE NUMBER	DATE
<i>[Signature]</i>		617-748-3988	12/7/04

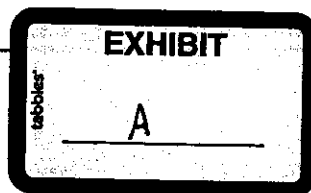
SPACE BELOW FOR USE OF U.S. MARSHAL ONLY — DO NOT WRITE BELOW THIS LINE

I acknowledge receipt for the total number of process indicated. (Sign only first USM 285 if more than one USM 285 is submitted)	Total Process 1	District of Origin 38 No.	District to Serve 38 No.	Signature of Authorized USMS Deputy or Clerk <i>[Signature]</i>	Date 12/10/04
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I hereby certify and return that I ☒ have personally served, ☐ have legal evidence of service, ☐ have executed as shown in "Remarks", the process described on the individual, company, corporation, etc., at the address shown above or on the individual, company, corporation, etc., shown at the address inserted below.☐ I hereby certify and return that I am unable to locate the individual, company, corporation, etc., named above (See remarks below)

Name and title of individual served (if not shown above)

Address (complete only if different than shown above)

☐ A person of suitable age and discretion then residing in the defendant's usual place of abode.

Date of Service

Time

2/7/05 9:28 am

Signature of U.S. Marshal or Deputy

[Signature]

Service Fee 180.00	Total Mileage Charges (including endeavors) 18.25	Forwarding Fee	Total Charges 198.25	Advance Deposits	Amount owed to U.S. Marshal or	Amount of Refund
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REMARKS:

12/17/04 - NOT KNOWN AT DENTIST OFFICE. APT ON 2nd FL - NO ANSWER 904 AM
 EDWARD S ZAMAITIS - NAME OF DENTIST OFFICE
 1/12/05 - NO RESPONSE
 1/29/05 - NO RESPONSE
 1/31/05 - NO RESPONSE
 NOTE: ATTENTION 51

PRIOR EDITIONS
MAY BE USED

3. NOTICE OF SERVICE

FORM USM-285 (Rev. 12/15/80)